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Attorney for Defendant – SHI KOZULYN BASS

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
\* \* \*

UNITED STATES OF AMERICA,	)	2:22-CR-00221-JCM-NJK-2
	)	
	)	
Plaintiff,	)	
	)	
v.	)	2 <sup>nd</sup> Request
	)	
SHI KOZULYN BASS,	)	
	)	
Defendant.	)	
	)	

**STIPULATION AND ORDER TO CONTINUE REVOCATION HEARING**

IT IS HEREBY STIPULATED AND AGREED by and between OSVALDO E. FUMO, ESQ., Counsel for Defendant SHI KOZULYN BASS and JEAN RIPLEY, Assistant United States Attorney, that STATUS HEARING currently scheduled for October 7, 2024 at 11:00 a.m., be vacated and reset to a date and time convenient to the court but no earlier than thirty (30) days.

This Stipulation is entered into for the following reasons:

1. Counsel has spoken to Defendant and she has no objection to the request for continuance.
2. Defendant is in custody.

3. Counsel for defendant has spoken to AUSA and she has no objection to the continuance.
4. Counsel and Government are continuing to have discussions on a resolution.
5. Counsel for Defendant begins a Murder Jury Trial in State of Nevada v Julius Trotter October 7, 2024 and it is anticipated to last for 2-3 weeks.
6. Counsel for Defendant then begins another Murder Jury Trial in State of Nevada v Isaac George on October 21, 2024 and it is anticipated to last for 1-2 weeks.
7. Counsel needs additional time to adequately review the case and/or resolve the matter.
8. Denial of this request for continuance could result in a miscarriage justice.
9. For all the above-stated reasons, the ends of justice would best be served by a continuance of the status hearing until a date and time convenient to the court.

This is the 2<sup>nd</sup> request for continuance filed herein.

DATED: October 4, 2024

/s/ Osvaldo E. Fumo Esq.  
OSVALDO E. FUMO, ESQ.  
601 Las Vegas Boulevard, South  
Las Vegas, Nevada 89101  
ATTORNEY FOR THE DEFENDANT  
SHI KOZULYN BASS

/s/ Jean Ripley , Esq.  
JEAN RIPLEY, ESQ.  
ASSISTANT UNITED STATES ATTORNEY  
501 LAS VEGAS BOULEVARD SOUTH. #1100  
LAS VEGAS, NEVADA 89101  
ATTORNEY FOR UNITED STATES OF  
AMERICA

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA, ) 2:22-CR-00221-JCM-NJK-2  
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Plaintiff, )  
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v. ) 2<sup>nd</sup> Request  
)  
SHI KOZULYN BASS, )  
)  
Defendant. )

**FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds:

This Stipulation is entered into for the following reasons:

1. Counsel has spoken to Defendant and she has no objection to the request for continuance.
2. Defendant is in custody.
3. Counsel for defendant has spoken to AUSA and she has no objection to the continuance.
4. Counsel and Government are continuing to have discussions on a resolution.
5. Counsel for Defendant begins a Murder Jury Trial in State of Nevada v Julius Trotter October 7, 2024 and it is anticipated to last for 2-3 weeks.
6. Counsel for Defendant then begins another Murder Jury Trial in State of Nevada v Isaac George on October 21, 2024 and it is anticipated to last for 1-2 weeks.
7. Counsel needs additional time to adequately review the case and/or resolve the matter.

1 8. Denial of this request for continuance could result in a miscarriage justice.

2 9. For all the above-stated reasons, the ends of justice would best be served by a  
3 continuance of the status hearing until a date and time convenient to the court.  
4

5 This is the 2<sup>nd</sup> request for continuance filed herein.

6 **CONCLUSIONS OF LAW**

7 Denial of this request for continuance would deny the parties herein the opportunity  
8 to effectively and thoroughly prepare for Status Hearing.

9 Additionally, denial of this request for continuance could result in a miscarriage of  
10 justice.  
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12 **ORDER**

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14 IT IS HEREBY ORDERED that the STATUS HEARING currently scheduled for  
15 October 7, 2024, at 11:30 a.m., be continued to the 20th day  
16 of November, 2024 at 10:30 a.m., in courtroom 6A.  
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18 DATED October 4, 2024.

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22 U.S. DISTRICT JUDGE  
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